



American Council of the Blind

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FCC Mail Room

September 10, 2015

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Lifeline and Link-Up Reform and Modernization (WC Docket No. 11-42, 09-197 and 10-90)

Dear Ms. Dortch:

The purpose of this letter is to express the support of the American Council of the Blind (ACB) for the Odin Mobile proposal.

ACB was founded in 1961 and is a leading organization that focuses on representing the needs of individuals who are blind or visually impaired. ACB and our affiliates have been at the forefront of the creation of policies that have shaped the opportunities that are now available to people with disabilities in our country. With respect to matters within the authority of the Federal Communications Commission (the Commission), we led the passage of the 21st Century Communications and Video Accessibility Act of 2010 (the CVAA) and have been an active participant in the Commission's corresponding proceeding.

ACB supports Odin Mobile's proposal that persons who receive equipment from State equipment distribution programs be eligible for Lifeline. These programs subsidize equipment for people with disabilities. The proposal, if adopted, will provide the States a strong incentive to modernize their programs to include equipment that supports broadband, as well as equipment that can be used by people with a variety of disabilities.

Focusing on equipment, not just service, is critical to increasing broadband adoption by people with disabilities. For example, individuals who are blind or visually impaired have a strong preference for products developed by Apple because of their excellent built-in screen readers. However, Apple products, such as the iPhone and iPad, are premium devices that are expensive and beyond the reach of individuals with low incomes. Low income individuals who are blind or visually-impaired will need assistance if they are to gain access to such devices. A few State equipment programs already offer iPhones and iPads, although typically to people who are deaf or hard of hearing, not blind. If adopted, this proposal will incentivize additional States to include such equipment in their programs, and to offer the equipment to people who are blind or visually impaired.

The Commission's efforts to modernize Lifeline provides an excellent opportunity to increase broadband adoption by low income individuals who are blind or visually impaired. ACB encourages the Commission to make the most of this opportunity and adopt this proposal.

Sincerely,

Eric Bridges, Interim Executive Director

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